

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

August 01, 2022

United States of America

v.

Krystal Brooke Ingram

Nathan Ochsner, Clerk of Court

Case No. **4:22-mj-1799**

---

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of from January 11 to August 1, 2022 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 1708

Theft of Mail

18 U.S.C. 1704

Unlawful Possession of a Postal Key

This criminal complaint is based on these facts:

See attached affidavit hereby incorporated herein.

☐ Continued on the attached sheet.*Complainant's signature*

Inspector Nicholas R. Underhill

*Printed name and title*

sworn to telephonically.

Date: August 01, 2022*Judge's signature*City and state: Houston, Texas

Yvoone Y. Ho, United States Magistrate Judge

*Printed name and title*

Print

Save As...

Attach

Reset

**4:22-mj-1799**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Nicholas R. Underhill, being duly sworn, hereby depose and say:

1. Affiant is a Postal Inspector (PI) with the U.S Postal Inspection Service (USPIS) and have been so employed since February 2019. Affiant is currently assigned to the USPIS Houston Division Financial Crimes Team, which is tasked with the investigation of complex mail theft crimes, including but not limited to, credit card fraud, money order fraud, bank fraud and identity theft. Affiant has gained experience in conducting such investigations through on the job training and everyday work-related investigations. Affiant has personally participated in investigations involving violations of federal law regarding mail theft and criminal groups that result from such unlawful activity. As a Postal Inspector, Affiant is authorized to investigate violations of the United States and to seek forfeiture of property under authority of the United States.

2. Affiant submits this affidavit in support of a Criminal Complaint charging Krystal Brooke **INGRAM** with violations of Title, 18 U.S. Code §1708 (Theft or receipt of stolen mail matter), 18 U.S. Code § 1704 (Keys or Locks stolen or reproduced) and 18 U.S. Code § 1028A (Aggravated identity theft).

3. Because this affidavit is being submitted for the limited purpose of securing a Criminal Complaint, Affiant has not included each and every fact known by the Affiant concerning the ongoing investigation. This affidavit is based upon Affiant's personal knowledge, or from information obtained or provided via records,

and interviews of witnesses and other law enforcement agents. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

**BACKGROUND**

4. On or about January 11, 2022, your affiant was assigned to follow up on a mail theft complaint from Donna Freeman at 2126 Augusta Drive, Houston, TX 77057 who observed a mail theft in progress earlier in the morning. Your affiant contacted Donna Freeman who stated she observed a female using what appeared to be a USPS key open and take mail from the neighborhood delivery collection box unit (NDCBU) outside of Freeman's residence on the morning of January 11, 2022. Freeman did not recognize the female as a resident in the neighborhood and contacted the female in-person who told Freeman she was "checking her mail". The female departed in the passenger side of a red Nissan Murano bearing Texas license plate number MXK8063. Freeman took a photo of the vehicle and a photo of the female although the photo of the female did not capture the female's face. Freeman provided the photos to your affiant.



**January 11, 2022 at around 8:19 a.m.**

5. Your affiant conducted research regarding the Texas license plate number MXK8063 and learned the registered owner's name and address. Your affiant later contacted the registered owner and learned the owner is a contracted driver with the rideshare company Lyft, Inc.

6. Your affiant requested records from Lyft, Inc. related to rides provided by the registered owner in the red Nissan Murano with Texas license plate number MXK8063 on January 11, 2022 from 5:00 a.m. to 9:00 a.m. central standard time. Lyft, Inc. later provided the records to your affiant who observed a rider picked up at 1998 Augusta Dr., Houston, TX 77057 at approximately 8:21:05 a.m. on January 11, 2022. The rider used a Lyft, Inc. account associated with phone number 281-925-9525 with the associated email address of "arlenekelsch069@gmail.com" with the destination address of 1900 Yorktown St., Houston, TX completed

at 8:27 a.m. with payment from a card ending in the last four digits of 2518.

7. Your affiant conducted law enforcement records and open-source internet research related to the name "Arlene Kelsch" in and around Houston, TX and identified one "Arlene Kelsch" in the Houston, TX area with a recent address of 306 McGowan St. Apt. 3307, Houston, TX 77006.

8. On June 8, 2022, at on or around 2:59 p.m., you affiant and USPIS Postal Inspector Lauren Brister interviewed Arlene Kelsch at her residence of 306 McGowan St. Apt. 3307, Houston, TX 77006 and identified Kelsch as a previous victim of mail theft at Kelsch's previous residence of 5455 Richmond Ave. Apt. 1402, Houston, TX. Kelsch lived at the previous apartment from April 2018 through February 23, 2022 and stated that when the Covid-19 pandemic started, the mail delivered to the community mail room was overwhelming and courier services left deliveries unsecured within the mail room. Kelsch learned numerous residents had mail stolen from the mail room. Kelsch further stated in July or August 2021 she received a call from Bank of America regarding her personal account that a new phone number with the prefix "281" attempted to login to her online banking account. Kelsch confirmed with Bank of America the login attempt was not her. Sometime after this incident, Kelsch received mailings from Chase Bank regarding credit applications that Kelsch did not initiate.

9. Kelsch further informed you affiant and Inspector Brister that Kelsch does have an active Lyft, Inc. rideshare account associated with her telephone number that is not 281-925-9525 and her email address is not "arlenekelsch069@gmail.com". Kelsch further checked her debit cards and none of the cards ended in the last four digits of 2518 used to pay for the Lyft, Inc. ride on January 11, 2022.

10. You affiant later requested records from Lyft, Inc. related to all rides provided by the Lyft, Inc. account associated with phone number 281-925-9525 with the email address "arlenekelsch069@gmail.com" from January 1, 2022 through June 22, 2022.

11. Your affiant later received records from Lyft, Inc. regarding the rideshare account associated with phone number 281-925-9525 with the email address "arlenekelsch069@gmail.com". You affiant reviewed the records and observed the account username "ARLENE Kelsch" associated with telephone number 2819259525 and the email address of "arlenekelsch069@gmail.com" with no profile photo and the sign up date and time of March 10, 2021 around 4:00 p.m. central standard time. Your affiant observed rides associated with the account from 1/2/2022 through 1/16/2022 with rides often picked up from the address 6885 Southwest Freeway, Houston, TX and rides often with the destination address of 6885 Southwest Freeway, Houston, TX. Your affiant conducted internet research using Google Maps and observed the address 6885 Southwest Freeway, Houston, TX as the address to the Romana Hotel.

12. Your affiant contacted Verizon Wireless and requested records related to cell phone number 281-925-9525. Verizon Wireless later provided the records and your affiant learned the cell phone number is assigned to a business account for STAR Concrete Pumping located in Tomball, TX with the phone number activation date of 2/10/2014. Your affiant later contacted STAR Concrete Pumping and learned the phone associated with telephone number 281-925-9525 was missing and the phone was not on the last phone audit conducted by company management on July 14, 2022. Your affiant confirmed the account number and the phone number is paid for and an active phone line with STAR Concrete Pumping's Verizon Business Account.

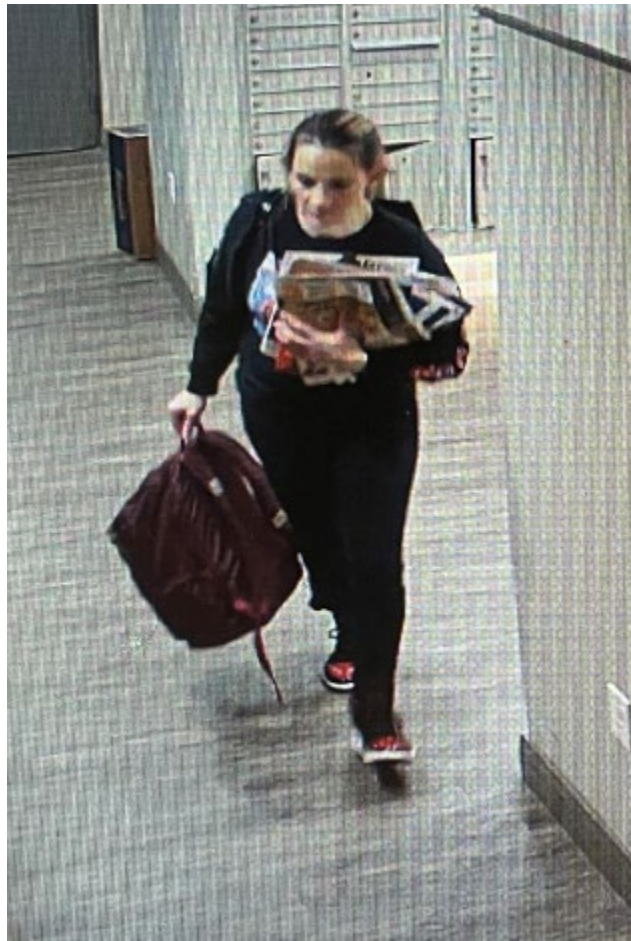
**Mail Theft**

13. On or around February 2, 2022, your affiant was assigned to follow up with a customer report of a volume mail theft attack at the Pearl at Mid Lane Apartments, 2121 Mid Lane, Houston, TX 77027 that occurred on the morning of January 28, 2022 with video of the incident available to law enforcement. On or around February 3, 2022, your affiant responded to the Pearl at Mid Lane Apartments, 2121 Mid Lane, Houston, TX 77027 and met with apartment management and obtained surveillance video of the mail theft incident. Apartment management informed your affiant there is a total of 329 apartments with mailboxes assigned to all apartments. Your affiant observed a female (later identified on July 28, 2022 as Krystal Brooke **INGRAM**) wearing a black long sleeve t-shirt with logos on the front and writing on the sleeves, dark colored pants, and red and black Nike high top shoes similar to the female photographed on January 11, 2022. **INGRAM** arrived at the apartment mail room on or around 3:08 a.m. on January 28, 2022 and appeared to use a counterfeit USPS arrow key to access nearly all of the apartment mail boxes and leave carrying a large amount of mail. **INGRAM** placed stolen mail into a large black Tory Burch brand bag and departed around 5:35 a.m. Apartment management informed your affiant the Tory Burch brand bag was stolen in that mail theft incident incoming to an apartment resident.

14. Apartment management provided your affiant with mail found in the stairwell and mail room trash. Your affiant entered the mail into USPIS evidence and later provided the mail to USPIS Forensic Laboratory Services to develop latent fingerprints for identification from the mail pieces. USPIS Forensic Laboratory Services later informed your affiant that fingerprints were obtained from the mail pieces and searched through the FBI AFIS



database and returned no match.



**January 28, 2022 at around 5:23 a.m.**

15. Your affiant recognized the shoes in the surveillance photo from January 28, 2022 at around 5:23 as similar to the shoes in the photo of the female suspect on January 11, 2022 at around 8:19 a.m. Your affiant contacted Freeman and showed the photo from January 28, 2022 to Freeman who stated the female on January 11, 2022 could be the same female but looked older with more scars or pockmarks on her face.

16. On or around February 10, 2022, apartment management at the Pearl at Mid Lane Apartments, 2121 Mid Lane, Houston, TX 77027 contacted you affiant and stated the same female **(INGRAM)** returned to Pearl at Mid Lane Apartments sometime in the middle



of the night and stole mail using what appeared to be a USPS key. Your affiant later responded to the apartment complex and reviewed surveillance footage of the mail room and observed on February 10, 2022, at around 4:46 a.m. **INGRAM** arrived at the apartment complex mail room and proceeded to open numerous mail panels with what appeared to be a counterfeit USPS key then remove mail. **INGRAM** departed the mail room at on or around 6:02 a.m. carrying a brown box with a battery marking and stolen mail placed into the bag carried by **INGRAM**.



**February 10, 2022 at around 6:02 a.m.**

17. On June 9, 2022, Inspector Gomez provided your affiant with a photo of a female suspect who stole mail from the Flats on Tanglewilde Apartments, 2630 Tanglewilde St., Houston, TX 77063. Your affiant immediately recognized the female (**INGRAM**) as the same female from the mail theft incidents at the Pearl at Mid Lane apartment complex.



**INGRAM inside the Flats on Tanglewilde Apartment Complex**

18. On June 9, 2022, Inspector Farmer provided your affiant with a photo of a female suspect who stole male from the Pearl Woodlake Apartment complex, 2033 S Gessner Rd., Houston, TX 77063. Your affiant immediately recognized the female (**INGRAM**) as the same female from the mail theft incidents at the Pearl at Mid Lane apartments and Flats on Tangelwilde. Inspector Farmer informed your affiant that the photo was obtained by Texas Department of Public Safety (DPS) Special Agent (SA) Justin

Murphy who is the courtesy officer and a resident at the Pearl Woodlake Apartment Complex, 2033 S Gessner Rd., Houston, TX 77063.



**June 7, 2022 at around 5:32 a.m.**

19. Your affiant responded to the Flats on Tanglewilde, 2630 Tanglewilde St., Houston, TX 77063 and reviewed the surveillance video. Your affiant observed **INGRAM** enter the apartment mail room and use what appeared to be a counterfeit USPS arrow key to access the apartment mail boxes and steal mail from the apartment mail boxes on the following dates and times:

a. June 3, 2022 from around 2:36 a.m. to around 3:27 a.m. **INGRAM** arrived and entered the apartment complex on the west entrance and wore sweats and a purple tank top. **INGRAM** closed the mail room blinds as she entered. **INGRAM** appeared to use a counterfeit USPS arrow key to open the mailboxes and steal mail.

b. June 5, 2022 from around 2:35 p.m. to around 3:02 p.m.

**INGRAM** arrived on an electric scooter and appeared to use a counterfeit USPS arrow key to open the mail boxes and steal mail. **INGRAM** carried a black and white checkered backpack and placed the stolen mail inside the backpack.

c. June 7, 2022 from around 4:54 a.m. to around 5:23 a.m. **INGRAM** wore running shorts, white Adidas shoes and carried a large orange handbag over her shoulder and appeared to use a counterfeit USPS arrow key to open the mail boxes and steal mail. **INGRAM** placed the stolen mail inside the orange handbag and departed the mail room after confronted by several residents.

20. Your affiant attempted to obtain the surveillance video from the Flats on Tanglewilde Apartment complex and the apartment management contacted the surveillance company and the company was not able to download the footage. Inspector Underhill reviewed the footage and took several photos of the video surveillance.

21. Your affiant responded to the Pearl Woodlake Apartments, 2033 S Gessner Rd., Houston, TX 77063 and obtained surveillance video from around 5:30 a.m. to 6:15 a.m. and observed on or around 5:30 a.m., **INGRAM** arrived at the mail room wearing a purple tank top, running shorts, white Adidas shoes and carrying a large orange handbag. **INGRAM** used what appeared to be a counterfeit USPS arrow key to access and steal mail from the mailboxes. **INGRAM** appeared to sort through some mail, return some mail pieces to the mailboxes, and discard mail in the trash. Your affiant observed a tattoo on the right outer ankle of **INGRAM**. **INGRAM** departed the mail room at around 6:12 a.m.

22. On July 19, 2022, SA Murphy contacted your affiant for support regarding repeat mail theft incidents at the Pearl Woodlake Apartments, 2033 S Gessner Rd., Houston, TX 77063. SA Murphy stated the same female (**INGRAM**) broke into the mail room



at around 1:52 a.m. on July 19, 2022. Your affiant responded to the Pearl Woodlake Apartments and obtained surveillance video of **INGRAM** who arrived at the apartment complex at on or around 1:51 a.m. and used what appeared to be a counterfeit USPS arrow key to access the apartment mail boxes and steal mail. **INGRAM** departed at around 4:00 a.m.

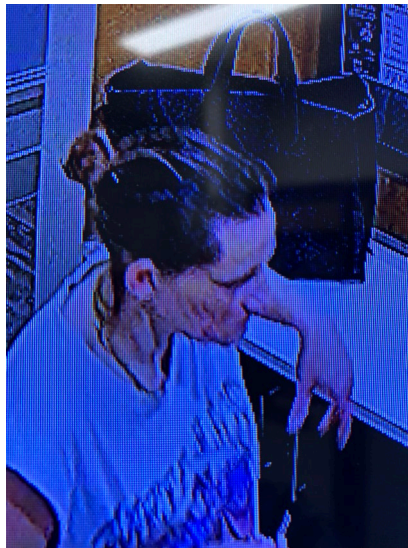


**July 19, 2022 at around 3:27 a.m.**

23. On July 21, 2022, SA Murphy informed your affiant that he never received an incoming Southwest Airlines Chase credit card ending in the last four digits of 1938. SA Murphy ordered the card around July 8, 2022. SA Murphy informed your affiant that on the morning of July 19, 2022, the card was used at Wal-Mart #772 in the amount of \$100.00, Wendys 9081 in the amount of \$13.04 and Exxon Food Mart in the amount of \$40.74.

24. On July 26, 2022, your affiant installed a motion activated sensor into the mailbox assigned to SA Murphy at the Pearl Woodlake Apartments, 2033 S Gessner Rd., Houston, TX 77063 that would alert your affiant to the opening of the mailbox.

25. On July 27, 2022, your affiant observed a motion alert at 3:56 a.m., 3:58 a.m., and 4:25 a.m. from the motion activated sensor in SA Murphy's assigned mailbox. USPIS Senior Technical Surveillance Specialist Oates responded to Pearl Woodlake Apartments, 2033 S Gessner Rd., Houston, TX 77063 and obtained the video surveillance of the incident and observed that at around 3:24 a.m., **INGRAM** exited the passenger side of a Honda SUV bearing Texas license plate number HXT6726 then enter the apartment complex parking garage by pushing through the middle of the vehicle gates. **INGRAM** entered the mailroom and appeared to use a counterfeit USPS key to access and steal mail from the apartment mailboxes then departed at around 4:42 a.m.



**July 27, 2022 between around 3:24 a.m. to 4:42 a.m.**

**Identification of Krystal Brooke INGRAM**

26. On July 25, 2022, Arlene Kelsch contacted your affiant and stated that she learned a WebBank/Avant card was opened in

Kelsch's name associated with Kelsch's social security number. Avant would not provide Kelsch information regarding the account except for the phone number provided by the person who opened the account as 281-925-9525. Your affiant recognized the phone number as the same phone number used for Lyft, Inc. rideshare on January 11, 2022.

27. On July 28, 2022, Arlene Kelsch informed your affiant that she ordered and reviewed her credit reports from the three major credit bureaus. Kelsch observed credit obtained with the mailing address of PO Box 740542, Houston, TX 77274. Kelsch informed your affiant that she never opened the PO Box and no one had her permission to use her information to open or obtain credit using her personally identifiable information or social security number. Kelsch later informed your affiant that Kelsch observed accounts with Synchrony Bank and Capital One bank associated with Kelsch's social security number reported on the credit reports.

28. Your affiant requested USPIS analytical support regarding PO Box 740542, Houston, TX 77274 to obtain information related to the person that opened and used the PO Box. USPIS Analysts later provided your affiant with the USPS PO Box information, and the Texas driver license associated with number that opened PO Box 740542 in the name of Krystal **INGRAM**, and the NCIC criminal history for **INGRAM**. Your affiant reviewed the PO Box information and observed the PO Box opened around July 15, 2021 online by customer ID number 224304432 in the name of Krystal Ingram with ID number XXXX8934 with the associated address of 6885 Southwest Freeway, Houston, TX 77074. Your affiant recognized the address as the address for the Romana Hotel.

29. Your affiant reviewed the Texas driver license photo for the Texas driver license in the name of Krystal **INGRAM** with the date of birth in 1980 and immediately recognized **INGRAM** as the



female mail theft suspect.



**Texas driver license photo of INGRAM**

30. Your affiant reviewed the NCIC Criminal History for Krystal **INGRAM** and observed criminal history in the State of Texas with an active warrant number W296442473 for "fraud-illeg use credit cards" with case number 1765937 with the date of warrant of 5/10/2022. Your affiant further observed convicted misdemeanor charge for theft on 1/4/1999, convicted misdemeanor charge for assault causes bodily injury on 10/02/2000, dismissed forgery financial instrument charges on 8/28/2001, convicted felony for theft from person on 7/20/2001, convicted felony charge for possession of controlled substances on 7/20/2001, convicted felony charge for possession of controlled substance on 4/12/2004, convicted misdemeanor for theft of property over \$50 and less than \$500 on 9/06/2005, and more with the most recent convicted felony on 2/19/2020 for fraud use/poss

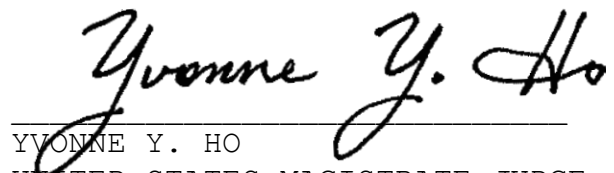
identifying info of items less than five by Montgomery County Sheriff's Office according to NCIC.

31. Based upon the totality of the foregoing facts and circumstances, Affiant believes that evidence of the violations of Title 18 U.S. Code §1708 (Theft or receipt of stolen mail matter), 18 U.S. Code §1704 (Keys or Locks stolen or reproduced) and 18 U.S. Code §1028A (Aggravated identity theft) do exist, and that there is probable cause for the issuance of an arrest warrant for Krystal Brooke **INGRAM**.



NICHOLAS R. UNDERHILL  
United States Postal Inspector

Subscribed and sworn to telephonically in Houston, Texas, on this 1st day of August, 2022, and I do find probable cause.



YVONNE Y. HO  
UNITED STATES MAGISTRATE JUDGE  
Southern District of Texas